Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Recommendations of the Independent	)	
Panel Reviewing the Impact of Hurricane	)	EB Docket No. 06-119
Katrina on Communications Networks	)	
	)	
	)	

COMMENTS OF THE CALIFORNIA DEPARTMENT OF TRANSPORTATION

Office of Radio Communications

Ferdinand Milanes, Chief

SUMMARY

The California Department of Transportation (Caltrans) respectfully submits these comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above proceeding. The NPRM and its appendices address the impact of Hurricane Katrina on communications and lessons learned regarding the response and recovery efforts as well as readiness and preparedness planning for future catastrophes.

BACKGROUND

The California Department of Transportation (Caltrans) operates extensive wireline, fiber optic and wireless communications systems throughout the State. These systems include:

- Pubic Safety Radio System with wireless coverage provided over the entire state. This system provides communications to approximately 12,000 field personnel and includes more than 200 fixed communications sites.
- Highway Advisory Radio Network (Travelers Information Stations) including approximately 120 fixed and mobile AM stations and two fixed Low Power FM stations.
- Approximately 1000 miles of Fiber Optic communications facilities.
- Four fixed and three mobile satellite communications systems with multi-channel wideband voice and data capability and portable public safety repeater stations. 13 fixed and 10 mobile satellite communications systems with voice capability.

- Amateur Radio Systems and Operators throughout the State.

Caltrans also facilitates multiple wireless, wireline and fiber optic communications providers along its right of way throughout the state.

The diverse terrain, geo technical and socioeconomic climate of California provides for a wide range of telecommunications challenges. Although California has not directly experienced a hurricane, we have had numerous experiences with similar events including: major storms, heatwaves, earthquakes, widespread power outages, social unrest, flooding and levee failures. Caltrans places the highest priority on communications, as a first responder to these events, and is very appreciative of the Federal Communications Commission role in promoting the safety of life and property through the use of wire and radio communications.

COMMENTS

A. Pre-Positioning for Disasters

Caltrans supports the development of a "readiness checklist" and formal business continuity plans for deployment during times of disaster. It is essential to for our agency to be able to provide services in the most effective manner possible in the event of an emergency.

Caltrans supports the use of training exercises as an important way to prepare personnel for the use of communications equipment and systems during an emergency. Caltrans operates multiple levels of redundant communications systems which can, and have, been used during emergencies. These systems include: public safety radio, microwave telephone, satellite telephone/video, amateur radio and web based communications. However, these systems do not perform effectively without continuous training and exercising the equipment on a weekly (or regular) basis. Also, we find that remote monitoring and control of our generator stations permits the frequent and automated exercise of our equipment to increase reliability.

Promoting the awareness of non-traditional alternatives for communications during emergencies would be useful to permit other available communications technologies to be incorporated into emergency response plans. The emerging technologies of Intelligent Vehicle Highway Systems (IVHS) should also be considered.

A streamlined procedure to grant waivers of regulatory requirements and granting Special Temporary Authority would greatly aid the ability of first responders to perform their functions protecting life and property during emergencies. For example the CFR 47 section 90.242 (a)(7) provides strict limitations on the use of Travelers Information Stations. During emergencies, Travelers Information Stations could be very useful tools to provide important

information to the public. They cover a wide geographic area with high population densities and are designed to operate reliably during power failures to provide localized current information.

Additional consideration should be given to regulatory change to permit the implementation of a common primary frequency designation for Traveler's Information Stations. The current secondary status of these stations makes them a potentially high risk investment because they can be required to cease operation whenever a commercial station changes their broadcast power or frequency.

B. Recovery Coordination

Caltrans supports the facilitation of coordination between communications infrastructure providers and state and local emergency preparedness officials. High capacity communications infrastructure now exists on state highways. For example a 144 fiber optic cable providing major communications services to San Franciso was damaged during the structural failure and construction operations to restore the San Francisco Oakland Bay Bridge after the Loma Prieta earthquake. Close coordination was difficult to establish between state emergency responders and the communications infrastructure providers. Redundant paths should need to be identified and implemented whenever a critical communications facility is installed on any structure subject to failure during a catastrophic event.

Caltrans supports the promotion and implementation of Government Emergency Telecommunications Service (GETS), Wireless priority service (WPS), and Telecommunications Service Priority (TSP). These services are currently underutilized by our agency, as identified in the report, and could provide enhanced communications for response to emergencies.

C. First Responder Communications

Caltrans supports the expedited deployment of 700 MHz systems. Our current 800 MHz system has reached capacity in the densely populated Los Angeles and San Francisco areas. Or ability to respond to catastrophic events is hampered by the limitations on availability of 700 MHz spectrum. All of our end user equipment will be capable of operating on the 700/800 MHz frequencies this year. But spectrum availability currently limits our ability to operate in the 700 MHz band.

The implementation of currently designated frequencies for interoperability in the 800MHz, UHF and VHF bands should also be facilitated on an expedited basis.

Caltrans supports the pre-positioning of equipment and other proactive measures for disaster response. However, we have found that utilizing the pre positioned equipment in normal day-to-day operations is an effective way to make sure the equipment and personnel are operational and ready to deploy whenever the need arises. For example Caltrans pre-positions emergency satellite voice/data/video equipment in the Los Angeles, Sacramento and San Francisco areas. This equipment and personnel are exercised, as a system, on a weekly basis and utilized locally for day-to-day activities when needed. However, in the event of an emergency, this equipment can be deployed wherever it is needed most.

D. Emergency Communications to the Public

Caltrans urges the Commission to facilitate the adoption of the Emergency Alert System (EAS) for use with Travelers Information Stations (TIS). Other locally designated emergencies should also be facilitated on the TIS stations. Current rules already provide for the incorporation of EAS on Low Power FM (LPFM) stations. Extending this practice to TIS stations would facilitate the transmission of important localized information to the public on the AM band.